

In the Matter of:

MAGGIE RUSSELL

VS

MISS. GULF COAST COMMUNITY COLLEGE

MCGEHEE, AIMEE

March 29, 2023

eDeposition
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MAGGIE RUSSELL vs MISS. GULF COAST COMMUNITY COLLEGE
Aimee McGehee - 03/29/2023

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
3 SOUTHERN DIVISION

4

5 MAGGIE RUSSELL PLAINTIFF

6 VS. 1 : 22-CV-00086-TBM-RPM

7 MISSISSIPPI GULF COAST COMMUNITY
8 COLLEGE through its Board of
9 Trustees (in their official
capacities) and DOES 1-20; inclusive DEFENDANTS

10 DEPOSITION OF AIMEE MCGEHEE

11

12 Taken at the offices of Boyce Holleman &
13 Associates, 1720 23rd Avenue, Gulfport,
14 Mississippi, on Wednesday, March 29, 2023,
beginning at 3:09 p.m.

15

16

17

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1 A P P E A R A N C E S

2

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18 ALSO PRESENT:

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20 Jason Pugh
21 Philip Bonfanti

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S T I P U L A T I O N

2 It is hereby stipulated and agreed by and
3 between the parties hereto, through their
4 respective attorneys of record, that this
5 deposition may be taken at the time and place
6 hereinbefore set forth, by Kati Vogt, RPR, RMR,
7 CRR, RDR, Court Reporter and Notary Public,
8 pursuant to the Federal Rules of Civil Procedure,
9 as amended;

10 That the formality of reading and signing is
11 specifically RESERVED;

12 That all objections, except as to the form of
13 the questions and the responsiveness of the
14 answers, are reserved until such time as this
15 deposition, or any part thereof, may be used or is
16 sought to be used in evidence.

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1 AIMEE MCGEHEE,
2 having been first duly sworn, was
3 examined and testified as follows:
4 EXAMINATION
5 - - -
6 BY MR. ALTMAN:
7 Q. Hello, Ms. McGehee. How are you?
8 A. I'm well. How are you?
9 Q. All right.
-0 Have you ever had your deposition taken
-1 before?
-2 A. I have not. This is a new experience.
-3 Q. Okay. So let me go over a few things
-4 before we start.
-5 A. Okay.
-6 Q. One of the things, that's going to take
-7 some practice, is for you to wait for me to finish
-8 asking my questions and for me to wait for you to
-9 finish answering my questions so we get a nice
-10 clean record and the court reporter doesn't get mad
-11 at us. Okay?
-12 A. Sounds good.
-13 Q. You have to use verbal responses. Nods
-14 of the head, shakes of the head don't work. Gotta
-15 say yes/no. Okay? Real words. Okay?

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1 A. Okay.

2 Q. If I ask you a question and you don't
3 understand it, please let me know. Okay?

4 A. Okay.

5 Q. And if you don't tell me that you don't
6 understand the question, I'll assume that you did.
7 Okay?

8 A. Okay.

9 Q. And the last thing is, is that this is
10 not an endurance test. Anytime you think you need
11 a break, as long as there's no question pending, we
12 can take a break to meet your needs or anybody's
13 needs. Okay?

14 A. Okay.

15 Q. All right. What is your current title at
16 the university -- the college? I'm sorry.

17 A. I am the support services coordinator
18 and -- for the Harrison County campus, and I'm also
19 an enrollment specialist, and I am the C2C coach
20 for the college, Harrison County.

21 Q. What's a C2C coach?

22 A. It is a grant program funded by the
23 state, and it's for Complete 2 Compete. It's just
24 a program to help students who have been out of
25 college for a while, for at least 24 months, come

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1 back to be able to get their degree; and they get a
2 grant if they meet all the criteria.

3 Q. Okay. How long have you been with the
4 college?

5 A. Eight years.

6 Q. Okay. So during the relevant time period
7 in 2015 to 2019, you were there when Maggie Russell
8 was at the school, correct?

9 A. Correct.

10 Q. Okay. You worked directly with Maggie
11 Russell, correct?

12 A. Yes, I did.

13 Q. Now, approximately how many students do
14 you work with, you know, anything more than just a
15 passing moment?

16 A. Do you mean for accommodations or with
17 C2C or with enrollment specialist?

18 Q. For accommodations.

19 A. I generally each semester have anywhere
20 from 60 to a hundred students that ask for
21 accommodations per semester.

22 Q. Okay.

23 A. It varies per semester depending on our
24 enrollment.

25 Q. And --

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1 A. And -- I'm sorry. And also which
2 semester it is. I obviously have less students I
3 deal with in summer semesters because we have less
4 enrollment, so...

5 Q. Now, with respect to Maggie Russell, did
6 you spend more time with her than average for you?
7 And I'm only talking about, you know,
8 accommodations. More time with her than average,
9 or less?

10 A. Probably more than most students.

11 Q. Okay. And why is that?

12 A. Because she used her accommodations and
13 asked me to help her with a private room for
14 testing and also to help read test questions to
15 her.

16 Q. Okay. And in terms of reading test
17 questions, did you do that for her?

18 A. Yes, I did.

19 Q. Did anybody else do that for her, or did
20 you do it all the time?

21 A. If I was sick, there may have been
22 another person in my office that read them to her,
23 but I can't recall that that ever happened. It has
24 happened with other students, but I can't recall if
25 it's happened to Maggie or not.

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1 Q. Okay. How common is it for you to be
2 reading questions for a student?

3 A. Very common.

4 Q. Okay. And what percentage of your time
5 do you spend doing that for students?

6 A. Probably 5 percent. It's not something
7 that most students request, but it's available to
8 them if they need it.

9 Q. Okay. So I'm a little bit confused.
10 When I asked -- and maybe I just got it wrong, and
11 it's been a long day.

12 A. Okay.

13 Q. When Maggie was one of the students you
14 were working with, how many students did you read
15 questions for during that time approximately?

16 A. Probably two.

17 Q. Okay. So it's not that common that you
18 read questions for a student?

19 A. It's common that it is something I do
20 every semester, but I only have a few students that
21 usually require it each semester.

22 Q. Okay. Gotcha. Fair enough. Now I
23 understand. There was a little bit of a disconnect
24 that I didn't --

25 A. Sure.

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1 Q. -- quite -- I didn't quite understand.

2 When did you first meet Maggie Russell?

3 A. Her first semester, which I believe was
4 in 2015 in the fall.

5 Q. Okay.

6 A. Came in before classes started to talk
7 about accommodations and get that -- that process
8 started and set up.

9 Q. And I should have done this: What did
10 you do to prepare for today's deposition? And one
11 of the things I just want to caution you on, I'm
12 sure sister and brothers counsel will stop you -- I
13 don't want to know what you talked about with your
14 counsel. So I want you to be very careful about
15 that.

16 What did you do to prepare for today's
17 deposition?

18 A. I went back to look over emails and
19 conversations that I had with Maggie. I also went
20 back over any notes that I had put in our computer
21 system, reviewing meetings that I had with her and
22 her mother. And then I reviewed our guidelines and
23 our policies and procedures.

24 Q. Did you meet with anybody to prepare for
25 today's deposition?

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1 A. Yes. I met with counsel and some of the
2 leaders of our college.

3 Q. Okay. Who other than the people in this
4 room did you meet with?

5 A. Dr. Bradley and Dr. Brown.

6 Q. And were they part of the same meeting
7 where you met with the people in this room?

8 A. Yes.

9 Q. Did you have any meetings with anybody
10 else?

11 A. No.

12 Q. Okay. When was the last time you spoke
13 to Maggie or Susan Russell?

14 A. I believe the last conversation I had was
15 in 2019, and it was through email, and she was
16 telling me about a book that she was having
17 published, and she wanted me -- I'm sorry. It
18 wasn't about a book. It was about a contest she
19 was entering, and she wanted me to go and vote for
20 her.

21 Q. When was the last time you had a
22 discussion with either one of them concerning
23 Maggie as a student?

24 A. Probably 2018. Probably 2018.

25 Q. Was it before or after -- strike that.

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1 **You're aware that there was an OCR**
2 **complaint, correct?**

3 A. Yes, I was aware.

4 Q. **Okay. Was it before or after the OCR**
5 **complaint?**

6 A. I spoke with them after that.

7 Q. **Did you talk with them after the**
8 **Resolution Agreement was submitted?**

9 A. Yes.

10 Q. **Okay.**

11 A. I believe Maggie had a class after that,
12 so I was helping her with her accommodations after
13 that OCR agreement was made.

14 Q. **Okay. Now, when Maggie came in to --**
15 **strike that.**

16 When you met Maggie for the first time
17 to talk about her accommodations, you were aware
18 that she had difficulties with math, correct?

19 A. They discussed that in the first meeting,
20 and she also presented her IEP from high school.
21 So it had her -- it had some test results on there,
22 but it also had some information about her present
23 level of performance in high school.

24 Q. **And you were aware she had performed**
25 **pretty poorly on the ACTs, correct?**

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1 A. I don't know that I knew specifics about
2 her ACT. I did look at her grades, and I know that
3 she passed her high school classes in math, but she
4 struggled with the state test. And she was afraid
5 she wasn't going to get to graduate because she
6 couldn't pass a state test; but then the state
7 changed the rules, so she was able to graduate with
8 her B in Algebra 2, I believe.

9 **Q. Okay. When did you become aware that**
10 **Maggie was having difficulty with College Algebra**
11 **at the -- at the school?**

12 A. I believe it was when she was taking her
13 Intermediate Algebra class. Which specific
14 semester that was, I don't recall.

15 **Q. And she didn't pass that class,**
16 **Intermediate Algebra, correct?**

17 A. She withdrew from it.

18 **Q. The College Algebra or the Intermediate**
19 **Algebra?**

20 A. Intermediate Algebra.

21 **Q. Okay. Now, subsequent to that, she also**
22 **took College Algebra, correct?**

23 A. Yes.

24 **Q. And she withdraw from that class,**
25 **correct?**

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1 A. Yes.

2 Q. Now, did she take that class in the
3 summertime? Is that --

4 A. Yes.

5 Q. -- when she took that class? Okay.

6 And did you assist her with
7 accommodations during that class?

8 A. Yes.

9 Q. And what was your impression of her
10 ability to be successful in that class?

11 A. I don't know how she would be successful
12 in that -- I mean, I don't -- I guess I don't
13 understand your question.

14 Q. Okay. Whose -- do you know whose idea it
15 was for her to withdraw from that class?

16 A. Hers.

17 Q. Did you discuss it with her?

18 A. Yes.

19 Q. Did you agree that she should withdraw
20 from the class?

21 A. I did not agree or disagree. That's her
22 choice.

23 Q. So you didn't provide any kind of
24 assistance, counseling assistance in that regard to
25 her?

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1 A. I don't recall my exact conversation; but
2 I always supported Maggie and told her that, you
3 know, we were there to assist her with whatever she
4 needed. I did agree that having a summer class was
5 not the best option for her. But that was the
6 class they wanted to take, so that was the class
7 that she registered for.

8 Q. **When you say "they" wanted to take, who's**
9 **the "they"?**

10 A. She and her mother.

11 Q. **Okay. If she had continued with the**
12 **class and finished it, do you think she would have**
13 **passed the class, based on your working with her?**

14 MS. BROWN: Object to the form.

15 A. I don't work with them specifically with
16 tutoring and helping with classwork. I just help
17 with making sure accommodations are provided. And
18 I believe if she had gotten -- gone to the learning
19 lab and she had gotten a tutor and assistance, I
20 believe Maggie could have passed that class.

21 BY MR. ALTMAN:

22 Q. **There's a difference between that she**
23 **could have passed the class and would have passed**
24 **the class.**

25 MS. BROWN: Object to the form.

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1 BY MR. ALTMAN:

2 Q. "I believe that she could have" is just
3 totally -- you know, it's totally indefinite. So I
4 just want to be very clear with what you're saying.

5 MS. BROWN: Object to form.

6 A. I can't say that she would have passed it
7 because I don't know what her -- how she would have
8 worked and what kind of assistance she would have
9 gotten outside of class as far as tutoring.

10 BY MR. ALTMAN:

11 Q. Was there any educational counselors
12 available to Maggie that could have discussed that
13 kind of an issue with her?

14 MS. BROWN: Object to the form.

15 A. What kind of issue?

16 BY MR. ALTMAN:

17 Q. Like a guidance counselor, somebody that
18 she could discuss, you know, a little bit
19 bigger-picture stuff. Or was that you?

20 A. I am a -- I'm not a counselor. I'm an
21 enrollment specialist, and we help them choose
22 their classes based on sometimes test scores;
23 sometimes it's based on what classes they've
24 previously taken, what classes they need for their
25 program. So I would be a person that could help

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1 her with that.

2 Q. And did she discuss those kinds of issues
3 with you or her mother?

4 A. Her struggle with math?

5 Q. Yes.

6 A. Yes.

7 Q. And if I understand right, you were not
8 involved in seeing that she get tutoring or any
9 kind of assistance along those lines?

10 A. I can refer her to -- or advise her to go
11 down to the learning lab or Learning Resource
12 Center to get tutoring.

13 Q. And did you do that with Maggie?

14 A. Yes.

15 Q. With the College Algebra class?

16 A. Yes. All of her classes, anything she --
17 any of her classes, she could have gotten
18 assistance with at the LRC.

19 Q. I understand she could have gotten
20 assistance. Did you specifically say to Maggie on
21 the College Algebra, "Maggie, you need to go to the
22 learning center to try to get additional
23 assistance"?

24 A. Yes, I did advise her to do that.

25 Q. And what was her response?

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1 A. I don't recall whether she went or did
2 not -- did or did not go.

3 Q. I'm not asking whether she went or didn't
4 go. I'm asking what her response was to you when
5 you suggested to her that she go to the learning
6 center.

7 A. I don't recall what her response was.

8 Q. Did you recommend that with respect to
9 the Intermediate Algebra?

10 A. Yes.

11 Q. And what was her response with respect to
12 Intermediate Algebra?

13 A. I don't recall that either.

14 Q. Okay.

15 A. I know she was getting some assistance
16 from the instructor that was teaching the
17 Intermediate Algebra class at that time. She was
18 meeting with him, and they were -- he was
19 re-going-over things that he taught with her. Now,
20 I don't know if he was in the LRC at that time or
21 if that was just after class.

22 Q. Do you know if Maggie ever used the
23 Learning Resource Center for anything?

24 A. I don't know.

25 Q. Based on your experience with Maggie, do

1 **you think she could have been successful in a**
2 **Visual BASIC programming class?**

3 MS. BROWN: Object to the form.

4 A. I don't think that I can fairly answer
5 that question because I truly don't know everything
6 that they teach in that class. I don't know what
7 those class objectives are.

8 BY MR. ALTMAN:

9 **Q. Maggie also had trouble with reading**
10 **comprehension, correct?**

11 A. She never had any trouble in any of her
12 classes that required reading that I'm aware of.
13 She seemed to do well in them. I believe her IEP
14 did say something about reading comprehension, but
15 it was never an issue in any of her classes.

16 **Q. Then why did you need to read her**
17 **questions for exams?**

18 A. It's -- basically it was part of her --
19 something for her comfort level because of her
20 anxieties on tests and her autism.

21 **Q. Okay. Were there other students that you**
22 **worked with who had comparable disabilities to**
23 **Maggie?**

24 A. Yes.

25 **Q. What accommodations have you seen being**

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1 **provided to students with respect to the College**
2 **Algebra class?**

3 A. Extended time on tests, private room for
4 testing, use of a calculator. Those are three --
5 those are three that I see mostly.

6 **Q. Any others that you can think of?**

7 A. No.

8 **Q. This was -- I mean, reading the questions**
9 **is obviously another one.**

10 A. For math I didn't read a lot of questions
11 for Maggie. It was mainly for her other classes
12 that I would read questions for her, ones that were
13 more -- involved more words and not numbers.

14 **Q. And then she would sit and write the**
15 **answers to the questions based on your reading them**
16 **to her?**

17 A. Correct. Correct.

18 **Q. She did have extra time for the math**
19 **classes?**

20 A. Yes, she did.

21 **Q. And she had distraction-free testing?**

22 A. Yes, she did.

23 **Q. And who would proctor those situations?**

24 A. Either I would do it or it would be in
25 our assessment center in -- at our campus.

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1 **Q.** So in the assessment center, how did that
2 work?

3 **A.** They make an appointment to have a
4 test -- to take a test, usually on a computer.
5 They show up at that time and they're checked in,
6 and they go in and take the test, logging into
7 their program, Canvas or -- yeah, I think it's our
8 Canvas program, and then they take their test. And
9 they're proctored by the proctors that are in the
10 assessment center.

11 **Q.** Okay. And Maggie used the assessment
12 center sometimes?

13 **A.** She did.

14 **Q.** And she would take the -- her exams on a
15 computer?

16 **A.** She did.

17 **Q.** Okay.

18 **A.** There were multiple formats. She could
19 bubble in; she could circle; she could take it
20 on -- in the computer. So depending on what class
21 and what the test required.

22 **Q.** Okay. Thank you.

23 Now, were you part -- you're aware that
24 the OCR and the school came up with a resolution
25 agreement, correct?

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1 A. I am aware of that, yes.

2 Q. Okay. Did you see that resolution
3 agreement before it was signed by the parties?

4 A. No.

5 Q. Were you part of determining the
6 potential classes that would be offered to Maggie
7 as part of that agreement?

8 A. No.

9 Q. Do you think it would have been important
10 for Maggie to have been part of that process before
11 it was agreed to between the university and the OCR
12 -- the college and the OCR?

13 MS. BROWN: Object to the form.

14 A. I assumed Maggie was involved.

15 BY MR. ALTMAN:

16 Q. Would it surprise you to find out that
17 Maggie and her mother testified that nobody from
18 the OCR spoke to them before that agreement was
19 signed?

20 A. Yes.

21 Q. Do you think it's appropriate that Maggie
22 was not part of that process to decide what would
23 be good alternatives?

24 A. I think Maggie should have been involved
25 in that. I'm surprised that -- I find it hard to

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1 believe she wasn't involved in that.

2 Q. Well, the only testimony from her and her
3 mother is that they had no involvement whatsoever.

4 A. Okay.

5 Q. Do you think that the solutions that were
6 offered should have been solutions that Maggie
7 could have been successful at?

8 MS. BROWN: Object to the form.

9 THE WITNESS: Do I answer?

10 MS. BROWN: Yeah.

11 A. Yes -- ask that -- could you ask that
12 again? I'm sorry. Could you repeat it?

13 MR. ALTMAN: Can you read that back?

14 Sorry.

15 COURT REPORTER: "Do you think that the
16 solutions that were offered should have been
17 solutions that Maggie could have been
18 successful at?"

19 A. Of course we'd want the solutions to be
20 something she could be successful at. We want her
21 to earn her degree.

22 BY MR. ALTMAN:

23 Q. Were you aware that Maggie has been
24 diagnosed with dyscalculia?

25 A. Verbally I -- yes, they told me she was.

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1 Q. Do you know what that is?

2 A. Yes.

3 Q. What is it, as far as you understand?

4 A. It's a processing disorder dealing with
5 numbers and math calculations.

6 Q. Makes it very difficult to do math,
7 correct?

8 A. It does make it harder, yes.

9 Q. And so you would agree that given that
10 diagnosis, that Maggie may not ever be able to
11 complete a class that involves significant
12 mathematics, correct?

13 MS. BROWN: Object to the form.

14 A. No, I don't agree with that. I -- people
15 can pass math classes with disabilities just like
16 dyscalculia.

17 BY MR. ALTMAN:

18 Q. Have you ever dealt with another student
19 with dyscalculia?

20 A. Yes.

21 Q. And were they diagnosed with dyscalculia
22 before they had come to you?

23 A. Yes.

24 Q. Did you ever deal with a student who was
25 diagnosed with dyscalculia after they came to you?

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1 MS. BROWN: Object to the form.

2 A. No.

3 BY MR. ALTMAN:

4 Q. And you would agree those who were
5 diagnosed with dyscalculia at an earlier age would
6 have been learning coping skills, correct?

7 MS. BROWN: Object to the form.

8 A. Yes, they would have learned skills.

9 BY MR. ALTMAN:

10 Q. And you would agree that somebody that is
11 diagnosed later in life is going to have a much
12 harder time overcoming that deficit, correct?

13 MS. BROWN: Object to the form.

14 A. That's so subjective to each person. I
15 don't know how to answer that question.

16 BY MR. ALTMAN:

17 Q. Well, if they don't have the coping
18 skills --

19 A. But they can develop them.

20 Q. But it's harder as you get later in life
21 to develop those kind of skills, right?

22 MS. BROWN: Object to form.

23 A. I don't -- I don't know how to answer
24 that question because I think every person is
25 different, and so some people learn those skills

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1 faster than others. So I can't say that one person
2 is going to learn it faster or slower.

3 BY MR. ALTMAN:

4 Q. Now, what resources does the school
5 provide to a student with dyscalculia?

6 A. Accommodations.

7 Q. What kind of accommodations go to that
8 kind of a student?

9 A. The same accommodations that we discussed
10 earlier. They can have extended time, a quiet room
11 to test. They can use a calculator. They can --

12 Q. How -- sorry.

13 A. -- use the LRC to get tutoring.

14 Q. How does any of that give them coping
15 skills to deal with dyscalculia?

16 MS. BROWN: Object to form.

17 A. Coping skills?

18 BY MR. ALTMAN:

19 Q. Well, where does -- I mean, being given
20 more time and a distraction-free testing is not
21 going to give somebody tools to deal with a
22 disability like dyscalculia, right?

23 MS. BROWN: Object to the form.

24 A. We offer -- we have a licensed
25 professional counselor, LPC, and they can use that

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1 resource as well if they need to develop some --
2 some skills for anxiety about testing, anything
3 that could help them. And also going to the
4 learning lab, they can teach them skills to cope
5 with what's causing them issues with not being able
6 to pass those topics or objectives.

7 BY MR. ALTMAN:

8 **Q. Is there anybody in the learning center**
9 **that's got skills in helping students cope with**
10 **dyscalculia?**

11 A. Not that I'm aware of.

12 Q. **So how would going to the learning center**
13 **help her learn coping skills to deal with**
14 **dyscalculia?**

15 MS. BROWN: Object to the form.

16 A. They could teach her skills on how to
17 learn in different ways, different methods of doing
18 the same -- of achieving the same objective; but as
19 far as coping skills, I don't know how that would
20 happen.

21 BY MR. ALTMAN:

22 Q. **Did Maggie or Susan talk to you about the**
23 **fact they were trying to talk with Dr. Brown and**
24 **not receiving responses from Dr. Brown?**

25 A. No.

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1 Q. Is that the first -- is this the first
2 time you're hearing that?

3 A. That Dr. Brown did not respond to them?

4 Q. **Yes.**

5 A. Yes, that's the first I've heard of that.

6 Q. Did you hear that -- have you heard
7 anything inconsistent with that?

8 MS. BROWN: Object to the form.

9 A. Can you repeat that?

10 BY MR. ALTMAN:

11 Q. Have you heard anything inconsistent
12 with -- that's a really bad question.

13 Before today was it your understanding
14 that Dr. Brown responded to at least one of Susan
15 Russell's nine letters to her --

16 A. Yes.

17 Q. -- concerning the College Algebra?

18 A. Yes.

19 Q. Were those responses in writing?

20 A. I assume they were. I wasn't privy to
21 that.

22 Q. So you don't know as you sit here right
23 now?

24 A. I do not know.

25 Q. Okay. Now, how is it that you know that

1 **Dr. Brown responded to them?**

2 A. Just conversations.

3 **Q. With Dr. Brown?**

4 A. Yes.

5 **Q. Now, those conversations, did they take**
6 **place contemporaneously while these issues were**
7 **going on, or is that just in preparation -- you**
8 **know, once the lawsuit's been filed?**

9 A. We spoke before, as it was going on, you
10 know, just to get guidance as to what my -- what my
11 role was in it after she went further with the OCR.

12 **Q. Did you learn about the OCR complaint**
13 **contemporaneously?**

14 A. Yes.

15 **Q. Were you surprised by it?**

16 A. No. Her mother had threatened that in my
17 office before she even started it, so it wasn't a
18 surprise that she took it to that level.

19 **Q. Now, had the school offered her any kind**
20 **of course substitution before she went to the OCR?**

21 A. Not that I'm aware of. I know they've
22 offered other substitutions since then, but I'm not
23 sure about what timeline those happened.

24 **Q. And as a result of the school's agreement**
25 **with the -- strike that.**

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1 Have you ever seen the resolution
2 agreement with the OCR?

3 A. No.

4 Q. Did you become aware of the general terms
5 of the resolution agreement with the OCR?

6 A. Yes.

7 Q. Was that contemporaneously when it came
8 down?

9 A. Yes. I think Maggie's mother actually
10 shared what three classes she would need to take.

11 Q. You would agree that having to do three
12 classes instead of one is a lot more work, right?

13 MS. BROWN: Object to the form.

14 A. It would be more work, yes. However, she
15 had already completed one of those three prior to
16 that OCR agreement.

17 BY MR. ALTMAN:

18 Q. You'll have to forgive me. I'm kind of
19 blind here.

20 Was there ever any question in your
21 mind, based on your working with Maggie, that she
22 has significant deficits with respect to
23 mathematics?

24 A. I always knew math was a struggle for --
25 was going to be a struggle for Maggie.

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1 MR. ALTMAN: Why don't we take just,
2 like, five minutes. I don't need to keep
3 everybody sitting around.

4 (Off the record.)

5 BY MR. ALTMAN:

6 Q. Ms. McGehee, thank you for your time.

7 A. Thank you.

8 (Deposition concluded at 3:47 p.m.)

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1 CERTIFICATE OF COURT REPORTER

2 I, Kati Vogt, RPR, RMR, CRR, RDR, Court
3 Reporter and Notary Public in and for the County of
4 Harrison, State of Mississippi, hereby certify:

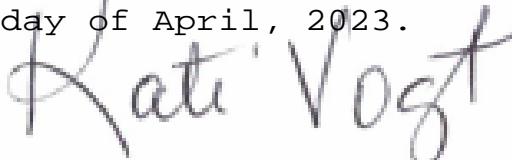
5 That on the 29th day of March, 2023, there
6 appeared before me AIMEE MCGEHEE;

7 That I placed the witness under oath to
8 truthfully answer all questions in this matter
9 under the authority vested in me by the State of
10 Mississippi;

11 That the foregoing 31 pages, and including
12 this page, contain a full, true, and correct
13 transcript of the testimony of said witness, as
14 reported by me using the stenotype reporting
15 method, to the best of my skill and ability.

16 I further certify that I am not in the employ
17 of, or related to, any counsel or party in this
18 matter, and have no interest, monetary or
19 otherwise, in the final outcome of the proceedings.

20 Witness my signature and seal, this 20th
21 day of April, 2023.

22 
23

24 Kati Vogt, RPR, RMR, CRR, RDR
My Commission Expires January 4, 2026

25



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ERRATA SHEET

2

I, AIMEE MCGEHEE, do solemnly swear that I have read the foregoing transcript and that the same is a true and correct transcript of the testimony given by me on the 29th day of March, 2023, at the time and place hereinbefore set forth, with the following corrections:

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NOTARIZATION

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Subscribed and sworn to before me, this _____
day of _____, 2023.

24

25

AIMEE MCGEHEE

NOTARY PUBLIC

MY COMMISSION EXPIRES: